IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

SFA SYSTEMS, LLC,	§	
	§	
Plaintiff,	§	
V.	§	
	§	Civil Action No. 6:10-cv-00300-LED
BIGMACHINES, INC.;	§	
BECKMAN COULTER, INC.;	§	JURY DEMANDED
ENTERASYS NETWORKS, INC.;	§	
RICOH AMERICAS CORPORATION;	§	
HYUNDAI MOTOR AMERICA, INC.; and	§	
CARESTREAM HEALTH, INC.,	§	
	§	
Defendants.	§	

SFA SYSTEMS, LLC'S ANSWER TO THE COUNTERCLAIMS OF CARESTREAM HEALTH, INC.

Plaintiff, SFA Systems, LLC ("SFA") hereby Answers the Counterclaims of Defendant Carestream Health, Inc. ("Carestream") filed August 19, 2010 (Dkt 36).

COUNTERCLAIMS

Unless otherwise addressed herein with an admission, the Plaintiff SFA generally denies all allegations in the Counterclaim. Each specific allegation is addressed as follows:

30. Counterclaim Plaintiff Carestream Health, Inc. is a Delaware corporation, with its principal place of business in New York.

ANSWER: Admitted

31. On information and belief based solely on Paragraph 1 of the Complaint as pled by SFA, SFA is a Texas limited liability company, with its principal place of business located in Marshall, Texas.

ANSWER: Admitted

32. This counterclaim arises under the patent laws of the United States, Title 35, United States Code. The jurisdiction of this Court is proper under at least 38 U.S.C. § 271 *et seq*. and 28 U.S.C. §§ 1331, 1338, 1367, and 2201-02.

ANSWER: Admitted

33. Venue is proper in this district pursuant to at least 28 U.S.C. §§ 1391 and 1400. Venue is further proper in the Tyler Division.

ANSWER: Admitted

COUNT I

34. Based on SFA's filing of this action and Carestream's First, Third, Fourth, and Fifth Defenses, an actual controversy has arisen and now exists between the parties as to whether Carestream infringes the '525 Patent.

ANSWER: Admitted

35. Pursuant to Federal Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, Carestream requests a declaration by the Court that it does not infringe any claim of the '525 Patent under any theory (including directly (whether individually or jointly) or indirectly (whether contributorily or by inducement).

ANSWER: Admitted that Carestream seeks a judicial declaration that it does not infringe any claim of the `525 patent. SFA denies that Carestream is entitled to such relief.

COUNT II

36. Based on SFA's filing of this action and Carestream's Second Defense, an actual controversy has arisen and now exists between the parties as to the validity of the claims of the '525 Patent.

ANSWER: Admitted.

37. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and 35 U.S.C. § 100 *et seq.*, Carestream requests a declaration by the Court that the claims of the '525 Patent are invalid.

ANSWER: Admitted that Carestream seeks a judicial declaration that it the claims of the `525 patent are invalid. SFA denies that Carestream is entitled to such relief.

Plaintiff SFA denies that Carestream is entitled to any of the relief requested in connection with its counterclaims.

Dated: September 13, 2010 Respectfully submitted,

BUETHER JOE & CARPENTER, LLC

By: /s/ Eric W. Buether

Eric W. Buether

State Bar No. 03316880

Eric.Buether@BJCIPLaw.com

Christopher M. Joe

State Bar No. 00787770

Chris.Joe@BJCIPLaw.com

Brian A. Carpenter

State Bar No. 03840600

Brian.Carpenter@BJCIPLaw.com

1700 Pacific Avenue

Suite 2390

Dallas, Texas 75201

Telephone: (214) 466-1271 Facsimile: (214) 635-1827

Andrew Wesley Spangler State Bar No. 24041960 **Spangler Law PC** 104 N. Houston St., Suite 135 Marshall, Texas 75670 Telephone: (903) 935-3443 Facsimile: (903) 938-7843 spangler@spanglerlawpc.com

David M. Pridham RI State Bar No. 6625 **Law Office of David Pridham** 25 Linden Road Barrington, Rhode Island 02806 Telephone: (401) 633-7247 Facsimile: (401) 633-7247 david@pridhamiplaw.com

ATTORNEYS FOR PLAINTIFF SFA SYSTEMS, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 13th day of September 2010. Any other counsel of record will be served by facsimile transmission and first class mail.

/s/ Eric W. Buether
Eric W. Buether